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Wildman Harrold
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November 21, 2005

Via Hand Delivery

Mary L. Fulghum, Esq.
Office of Regional Counsel
U.S. EPA Region 5 C-14J
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Chicago, Illinois 60604

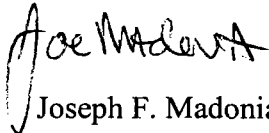
Re: 161 E. Grand Building

Dear Ms. Fulghum:

Enclosed is a report from ENVIRON that relates to the next phase of the Optimus HVAC Project. It also describes ENVIRON's oversight of the Phase I basement work. Optimus plans to conduct the work this week in accordance with ENVIRON's recommendations.

Sincerely,

WILDMAN, HARROLD, ALLEN & DIXON LLP


Joseph F. Madonia

JFM:ld
Enclosure

November 13, 2005

Mr. Tom Duff
President
OptImus
161 East Grand Avenue
Chicago, Illinois 60611

Re: OptImus – 161 East Grand Avenue Radiation Screening, Phase 2
Final Report for Submission to EPA

Dear Mr. Duff:

ENVIRON International Corporation ('ENVIRON') conducted additional radiation screening at the premises presently occupied by OptImus located at 161 East Grand Avenue in Chicago, Illinois ('Site'). This additional screening was conducted on October 14, 2005 and included locations where riser ducts will penetrate through floors, the roof as well as a location where an exterior door will be removed to install a fresh air intake. ENVIRON was assisted in the radiation screening by Mr. Knox McCormac, Operations Manager for OptImus.

In addition to this additional screening event, on October 15, 2005 ENVIRON observed the work practices of Brandenburg Industrial Service Company (Brandenburg) while two operations were being conducted in the basement of the Site:

1. Penetrations through walls; and
2. The installation of surface mounted hangars.

It is our understanding that the Site is continuing a renovation project that necessitates creating penetrations in the deck on all floor levels of the Site for the installation of heating, ventilation, and air conditioning ductwork. As such, this additional radiological screening was conducted to determine the background gamma radiation level within the specific areas within the renovation area. Hence, this letter report details ENVIRON's screening and observations from October 14 and 15, 2005.

BACKGROUND

An initial assessment was conducted on September 1, 2005 in order to establish a background level of radiation due to potential existence of residual thorium at the Site. A secondary assessment was conducted on September 8, 2005 and included specific wall penetrations that were not previously surveyed. Recommendations for making wall penetrations and installing brackets were provided for areas at the Site that exhibited gamma radiation levels above background (i.e., B7/B10 and adjacent areas).

METHODOLOGY AND SCOPE

In general, the following activities were conducted at the Site:

- Facility representatives assisted ENVIRON in identifying those areas where riser ducts will penetrate through each floor, the roof as well as the location where an exterior door will be removed to install the fresh air intake;
- After identifying those areas, the various structural and non-structural components of the Site (i.e., decking, rafters, walls, ceiling components, and ductwork) were screened to determine the level of background radiation that existed on these components. This screening was conducted using a Ludlum Model 3 survey meter and a gamma scintillation detector (Model 44-2) and was calibrated following protocols established by the United States Environmental protection Agency;
- ENVIRON observed the work practices of Brandenburg while wall penetrations were being made and hangars were being installed in the basement of the Site; and
- ENVIRON screened the resulting wall debris packed up for disposal by Brandenburg to determine the level of radiation in this debris, if any.

DISCUSSION

Table 1 presents the results in microRoentgens per hour (uR/Hr) for the gamma radiation survey in a tabular format while Figure 1, entitled "Optimus Readings" presents the general location from where the results were obtained, also in uR/Hr.

From previous Site visits, in general, the level of gamma radiation in the outdoor environment surrounding the Site (e.g., concrete sidewalk and the bricks/mortar of the building) ranged between 11 to 15 uR/Hr. As shown in Table 1, Gamma radiation screening results for the designated riser locations in the basement, first floor, and roof locations exhibited gamma radiation levels at or below 20 uR/Hr. Radiation levels increased on the second floor and ranged between 15-30 uR/Hr for various building components (i.e., floor, deck, rafter and the brick wall). For the third floor riser location, the floor readings ranged between 19-21 uR/Hr whereas the deck readings were 40 uR/Hr. The fourth floor riser location exhibited similar results (i.e., above background levels).

ENVIRON observed the following work practices while Brandenburg made penetrations and installed hangars in areas B7/B10 and adjacent areas:

- Building components in work areas were protected using 6 mil polyethylene plastic sheeting;
- Personnel conducting the penetrations were double suited and wore a half-face respirators with HEPA cartridges;
- Following work area preparations, a utility knife and powered hand tools were used to make wall penetrations;
- HEPA vacuuming was utilized to collect resulting dust;
- Debris was disposed of in waste bags that were double bagged and placed in a 55-gallon drums; and
- The waste from these operations had a radiation level of 25-30 uR/Hr.

RESULTS AND RECOMMENDATIONS

ENVIRON recommends the following for the additional floor and wall penetrations in these areas (i.e., the second, third and fourth floors) that exceed 20 uR/Hr:

- Isolate these areas from the remaining areas of the Site in order to conduct renovation activities;
- Identify the specific location where the floor/wall penetration will occur;
- Erect a "mini-enclosure" that isolates the proposed floor/wall penetration from the remaining area. This "mini-enclosure" should be under negative pressure and filtered through high efficiency particulate air filter (HEPA) system identical to those used in asbestos abatement. Additionally, the "mini-enclosure" should be large enough (e.g., 6' x 6') to allow for unencumbered access while still containing the operation; and
- All debris generated from these operations should be properly characterized and disposed of once all operations have been completed.

If you have any questions or concerns, please do not hesitate to contact me at (312) 853-9430, ext. 215.

Sincerely,

ENVIRON International Corporation

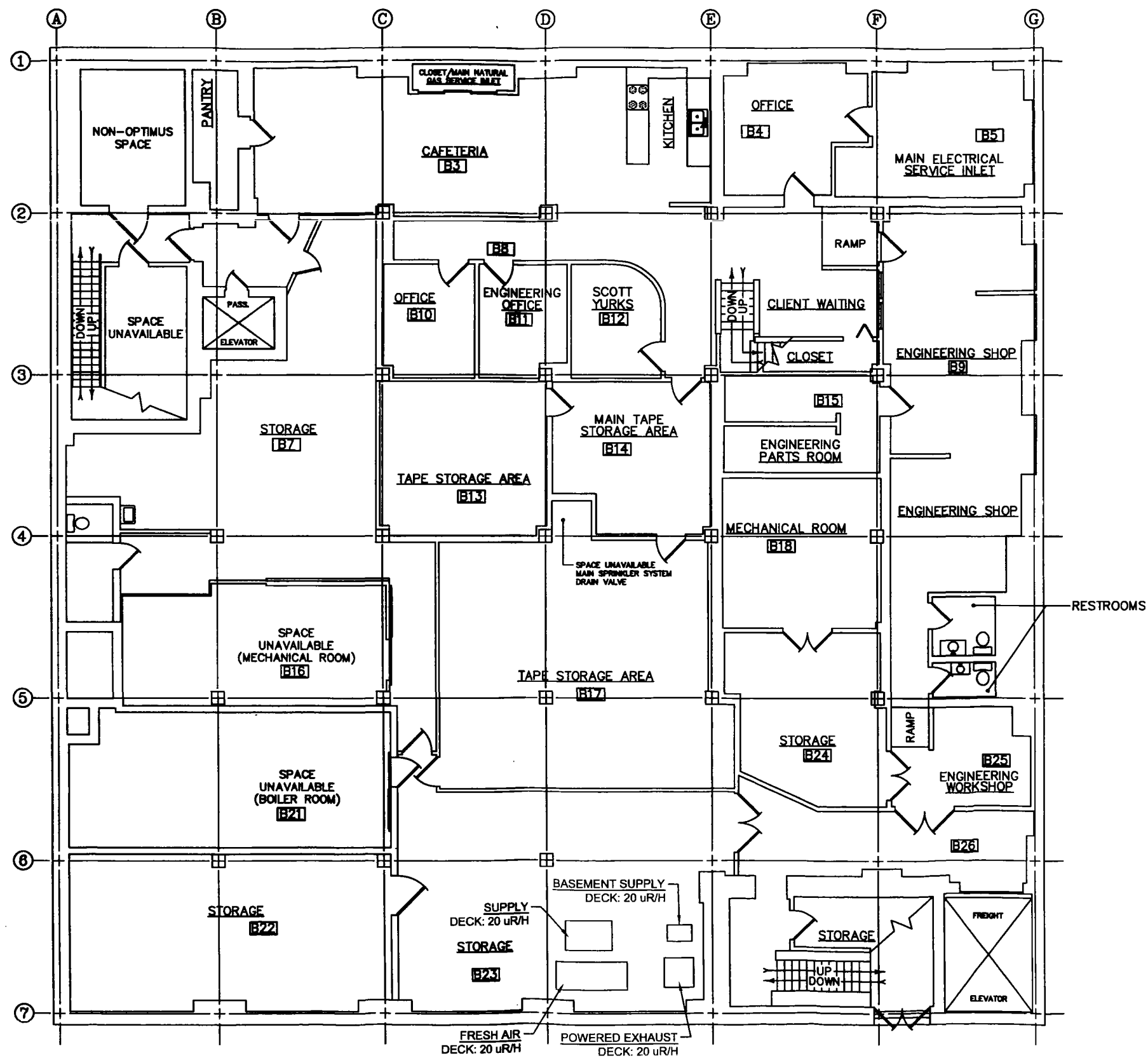
A handwritten signature in black ink, appearing to read "Mark Watka", with a stylized flourish at the end.

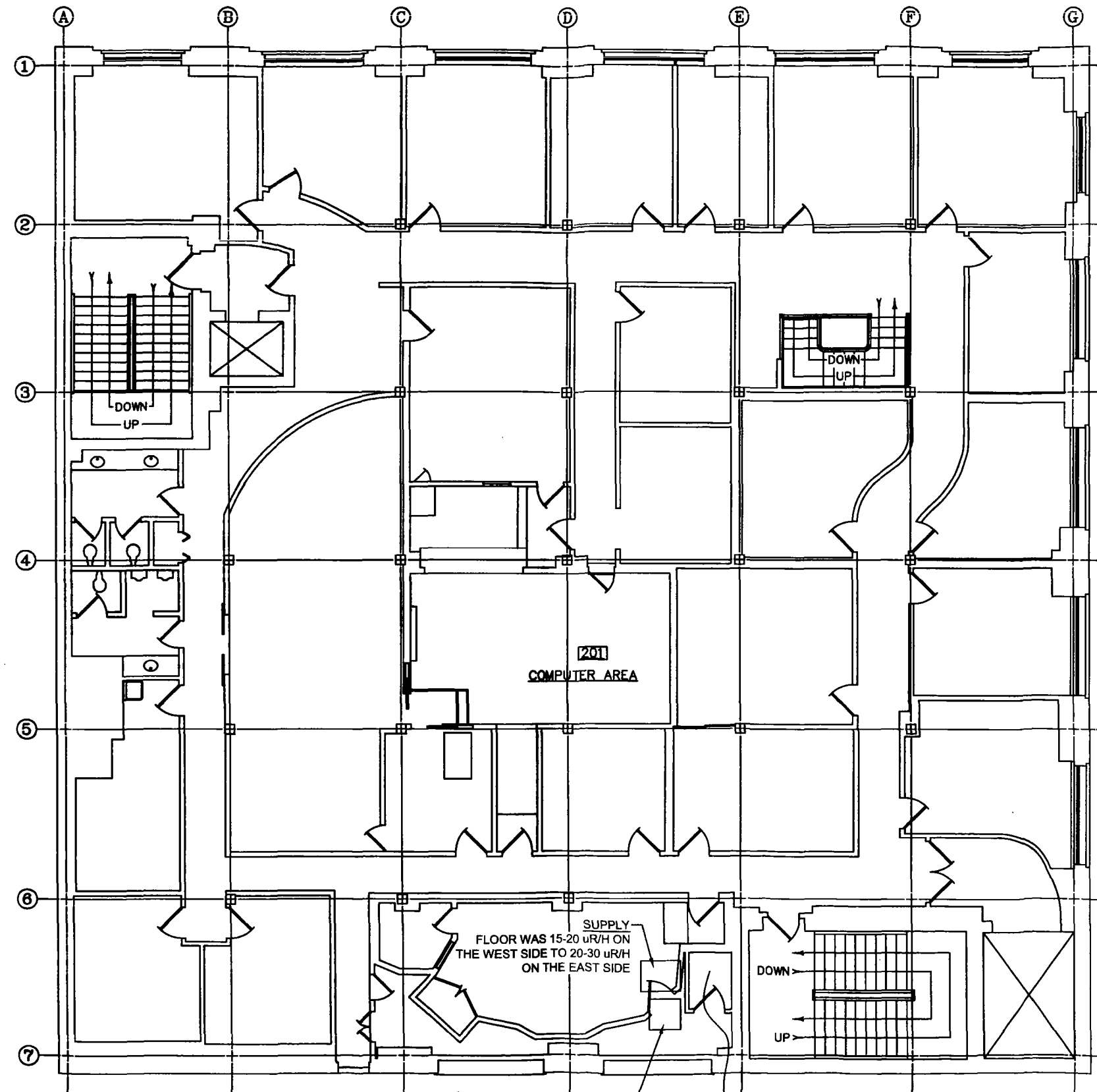
Mark S. Watka, CIH
Senior Project Manager

Enclosures

Table 1. Gamma Radiation Screening Results
Phase 2: Floors 1 – 4 & Roof
161 East Grand Avenue, Chicago, IL.

Area Location	Building Component	AVG. Reading (MicroR/hr)
Outdoors (Background)	Side Walk	11
	Building Wall	15
Basement Riser location	Deck	20
First Floor Riser location	Deck	15-20
	Rafter	15-18
	Floor	15-18
First Floor Fresh air intake location	Door	10-15
	Walls around door	15-20
	Floor around door	10-15
Second Floor Riser location	Floor (northwest side)	15-20
	Floor (northeast side)	20-30
	Floor (south side)	20-30
	Deck (east closet was only area accessible, existing ducts were located in areas of proposed opening)	20-25
	Rafter	20-25
	Brick wall	20-25
Third Floor Riser location	Floor	19-21
	Deck	40
Fourth Floor Riser location	Deck	30-50
	Floor	40-50
	Wall (brick, south side)	30
	Rafter	30
	Ceiling tile	30
	Wall studs	20
	Drywall	20
	Fiberglass wall insulation	20
Roof Riser location	Floor	14-19

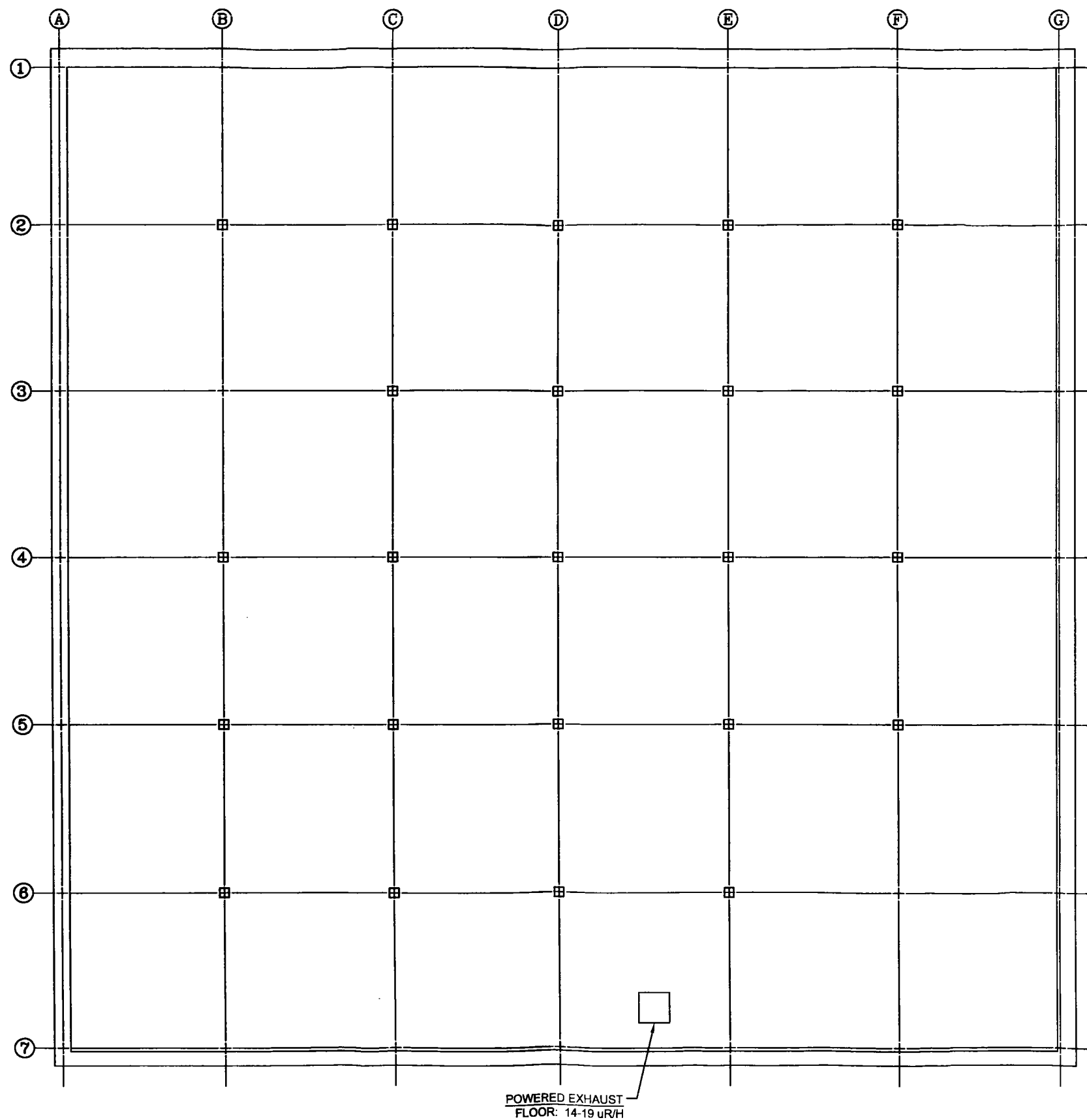




POWERED EXHAUST
FLOOR: 20-30 uR/H

COULD NOT MEASURE THE DECK OF THE 3RD FLOOR
DIRECTLY ABOVE THE OPENINGS BECAUSE OF EXISTING
DUCTS. WE DID MEASURE THE DECK IN THE EAST CLOSET.

DECK: 20-25 uR/H
RAFTERS: 20-25 uR/H
BRICK WALL: 20-25 uR/H



ROOF
HVAC MAIN RISER PENETRATIONS
SURVEY READINGS

ENVIRON

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